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CONTINGENCY PLAN

**AMERICAN CHEMICAL SERVICE SUPERFUND SITE
GRIFFITH, INDIANA**

Montgomery Watson File No. 1252042

**Prepared For:
ACS RD/RA Executive Committee**

**Prepared By:
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June 1999



MONTGOMERY WATSON

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
1.0 INTRODUCTION.....	1
2.0 EMERGENCY CONDITIONS AND RESPONSE ACTIONS.....	3
2.1 NOTIFICATION OF LOCAL AUTHORITIES.....	3
2.2 POTENTIAL EMERGENCY SITUATIONS	4
2.2.1 Fire or Explosion.....	4
2.2.2 Personal Injury	4
2.2.3 Utilities and Adjacent Property Owners.....	4
2.3 Air Monitoring Plan	4
2.4 Spill Prevention Control and Countermeasure Plan.....	5

TABLES

Table 2-1 Phone List - Utilities and Adjacent Property Owners

FIGURES

Figure 2-1 Site Location Map and Hospital Route

1.0 INTRODUCTION

This Contingency Plan (Plan) has been prepared in conjunction with the 95% Remedial Design for the American Chemical Service (ACS) Superfund Site in Griffith, Indiana (Site). This Plan should also be used in conjunction with the Site Safety Plan (SSP) and the SSP Addendum dated January 1996 and May 1999, respectively.

The Remedy for the Site consists of:

- *In-situ* soil vapor extraction (ISVE) in the Still Bottoms Pond Area, Off-Site Containment Area, and Kapica-Pazmey Area;
- Treatment of extracted vapor ; and
- Installation of an engineered cover over the areas containing buried waste.

The following items will be conducted or continued in accordance with the Record of Decision (ROD) and the amended ROD:

- Removal of the polychlorinated biphenyl (PCB)-impacted sediments in the wetlands area by excavating and disposing sediments off-site at a Toxic Substances Control Act (TSCA)-approved landfill or consolidating them at locations inside the barrier wall depending on contaminant concentrations, and in accordance with the PCB Sediment Excavation and Wetlands Restoration Work Plan;
- Removal and off-site disposal of the intact drums in the On-Site Containment Area in accordance with the Agency-approved Buried Drum Removal Plan;
- Continued groundwater pumping from the perimeter groundwater containment system (PGCS) and barrier wall extraction system (BWES) and treatment through the groundwater treatment plant in accordance with the performance standard verification plan (PSVP) for the groundwater treatment system;
- Active treatment and monitored natural attenuation (MNA) for groundwater outside the barrier wall in North and South/Southeast areas;
- Long term groundwater monitoring, in accordance with the Agency-approved groundwater monitoring program; and
- Private well sampling, in accordance with the Agency-approved groundwater monitoring program.

The ACS Remedial Design/Remedial Action (RD/RA) Executive Committee is responsible for responding in the event of an emergency incident and will implement the procedures outlined in this Plan. A meeting or meetings will be scheduled prior to the start of remedial construction activities to review the contents of this Plan with U.S. EPA, the Indiana Department of Environmental Management (IDEM), the Indiana Department of Natural Resources (IDNR), the Sanitary District of Griffith (District) Publically Owned Treatment Works (POTW), the Griffith Fire Department, the Griffith Police Department, the Lake County Sheriff's Department, and the Munster Community Hospital.

2.0 EMERGENCY CONDITIONS AND RESPONSE ACTIONS

The chemicals of concern that are present in the soils and waste at the Site are primarily:

- Volatile organic compounds (VOCs), including chlorinated hydrocarbons and benzene;
- Semivolatile organic compounds (SVOCS);
- PCBs; and
- Lead.

Soil and groundwater contamination at the Site will be contained by the barrier wall and engineered cover. The ISVE system, coupled with the groundwater dewatering system, will be utilized to remove contamination above the water table.

2.1 NOTIFICATION OF LOCAL AUTHORITIES

During or following an accident or emergency situation, the appropriate local authorities will be contacted as indicated below. If law enforcement agencies are required to assist with evacuation procedures or traffic control, the City of Griffith Police Department will serve as the primary agency. The Lake County Sheriff's Office will serve as the secondary agency and will be notified in the event the primary agency cannot respond or requests assistance. In the event of an injury or illness, the local ambulance service will respond to the "911" call and transport the victim(s) to Munster Community Hospital. An emergency route to the hospital is shown on Figure 2-1.

<u>Type of Emergency</u>	<u>Contact</u>	<u>Telephone Number</u>
Fire/Explosion	Griffith Fire Department	911
	Munster Community Hospital	(219) 836-1600
	Ambulance	911
Hazardous Waste or Chemical Spill	IDEM Emergency Response	(317) 233-7745
	EPA National Emergency Response Center	(800) 424-8802
	EPA Region V Spill Response	(312) 353-2318
Evacuation	City of Griffith Police Department (Primary Response)	911
	Lake County Sheriff	911

2.2 POTENTIAL EMERGENCY SITUATIONS

Given that 1) contamination at the Site will be contained underground by the cap and barrier wall and 2) the only operational equipment consists of the ISVE and groundwater dewatering systems, opportunities for emergency situations are minimal. However, potential emergency situations are discussed below.

2.2.1 Fire or Explosion

The most probable source of fire or explosion is the ISVE system, particularly the blower associated with the collection system. To minimize this potential, no smoking will be allowed near any component of the collection system, including the gas wells and blower. In addition, no flammable materials will be stored near the blower, and all equipment will be bonded and grounded, spark-proof and explosion-resistant, as appropriate. A fire hydrant will be located in close proximity on Site to provide water for fire suppression. An additional fire hydrant will be installed as part of the Remedial Action in the off-site area for fire suppression. Should a fire or explosion occur on the Site, the City of Griffith Fire Department will be called upon to respond. Based on the circumstances of the emergency, additional emergency response agencies, such as the City of Griffith Police Department or the Lake County Sheriff's Department, will be contacted as appropriate.

2.2.2 Personal Injury

Personnel trained in first aid and cardiopulmonary resuscitation (CPR) will attend to minor personal injuries on the Site, as appropriate. If a serious personal injury occurs on the Site, 911 will be contacted for ambulance service.

2.2.3 Utilities and Adjacent Property Owners

Any accident or emergency that occurs on or results in damage to an underground utility or adjacent property will be reported to the respective utility or landowner and applicable local authorities. Specific contact phone numbers are given in Table 2-1.

2.3 Air Monitoring Plan

Air emissions will occur during construction activity, as dust and vapors, and during ISVE system operation, as vapor. The following details air and off-gas monitoring activities during both the ISVE construction and operational phases.

During site activities, air monitoring will be conducted using a photoionization detector (PID), Dräger pump, MINIRAM, and Exotox 50® or equivalent:

PID. Each work zone shall be monitored for organic vapors using a PID equipped with a 10.2 or 10.6 eV lamp or equivalent. The PID will be checked daily and operated in the 0 to 2-parts per million (ppm) range. Organic vapor levels will be measured upwind of the work zone to determine a background reading on a daily basis. Readings in the breathing zone of site workers (2 to 5 feet above the ground) will be taken at 30-minute intervals, at a

minimum. More frequent monitoring will be conducted if readings above background are recorded. All PID readings will be recorded in a field log book by the OSO or designated Montgomery Watson personnel.

Exotox 50®. Each work zone shall be monitored for potential gases (specifically oxygen and flammables) using an Exotox 50®. Vapor levels will be measured upwind of the work zone to determine a background reading. Readings in the breathing zone of site workers (2 to 5 feet above the ground) and during excavation activities from within the excavation will be taken at 30-minute intervals, at a minimum. More frequent monitoring will be conducted if elevated readings are recorded. All Exotox 50® readings will be recorded in the field log book by the OSO or his/her designee. Exotox 50® monitoring of each work zone will be conducted as long as drilling or sampling operations are in progress and personnel are within the defined boundaries of the work zone.

Dräger pump. A Dräger pump equipped with benzene, chloroform, 1,1-dichloroethene, and carbon tetrachloride Dräger tubes with a response range of 0.5 to 10, 0.5 to 5, and 2 to 15 ppm will also be used to monitor the site. Benzene readings in the breathing zone of site workers (2 to 5 feet above the ground) will be taken during intrusive activities when PID readings above background are recorded. All Dräger readings will be recorded in the field log book by the OSO or his designee.

MINIRAM. Dust conditions will be both visually monitored and measured with a MINIRAM by Montgomery Watson personnel on a continual basis. The OSO or his designee will log visual observations and end-of-the-day time weighted averages obtained from the MINIRAM in the field log book.

During the operational phase, an air permit equivalency for the gas collection system is required. The air monitoring required to comply with the conditions of the IDEM air permit equivalency are found in the May 1999 Performance Standard Verification Plan (PSVP).

2.4 Spill Prevention Control and Countermeasure Plan

Given the nature of the containment and discharge systems employed at this site, a formal Spill Prevention, Control, and Countermeasures (SPCC) Plan is not required. However, because chemicals are used at the groundwater treatment plant, the following procedures will be implemented in the event of a spill:

- **Small Spill.** A small spill will be contained within the groundwater treatment plant building containment. The spill may be collected with a sump pit and may be absorbed with spill kits.
- **Large Spill.** All tanks used at the groundwater treatment plant have been designed with secondary containment systems. In the event of a release and secondary containment failure, the spill will be surrounded with absorbent

booms. The residual will be pumped into a holding tank. The proper authorities will be notified if the quantity released is of a reportable quantity.

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Table 2-1
Phone List
Utilities and Adjacent Property Owners
American Chemical Service, Inc. NPL Site
Griffith, Indiana

Name		Address	Phone Number
Austgen	Ron	1002 Reder Road	219-924-7528
Garmon	Jeff	1007 Reder Road	219-922-6629
Garmon	James	1009 Reder Road	219-924-2105
Sharp	Melanie	1029 Reder Road	219-922-0951
Floyd	Frank	1033 Reder Road	219-924-5488
Rucinski	Mark & Sheila	1043 Reder Road	219-924-2534
Austgen	Tom	1044 Reder Road	219-922-8171
Reder		1046 Reder Road	219-924-2743
Reder		1048 Reder Road	
Austgen	Randy & Kathy	1130 Reder Road	219-924-9289
Austgen	Sylvester & Irma	1130 Reder Road	219-924-8317
Maze	Dennis & Mary Anne	1130 Reder Road	219-924-6923
Farren	Terry & Sheri	938 South Arbogast	219-922-6486
Aeromet	Fred Wahlberg	739 South Arbogast	219-924-7442
Cottingham	Gerry	940 South Arbogast	219-924-9834
Birmingham	Timothy & Ellen	1008 South Arbogast	219-322-7988
Babbit	Michael & Kathy	1014 South Arbogast	219-332-4673
Neyhart	Dorothy	1016 South Arbogast	219-332-3398
Kellam	Brian & Sandra	1026 South Arbogast	219-332-0781
Lovich	Michael & Lena	420 East Avenue H	219-924-5563
Evans	Chuck	1009 South Wood	219-924-3506
Oak Ridge Prairie Park		301 South Colfax	219-769-7275
Ameritech			800-636-1200
NIPSCO			800-634-3524



Plot Date: 8/26/2008 8:00 AM

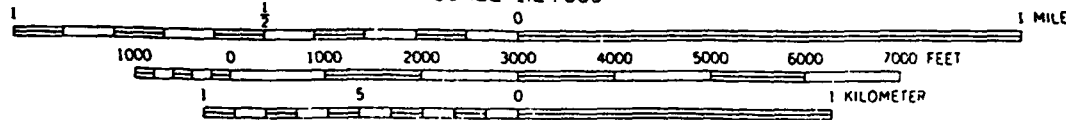
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UTM GRID AND 1991 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET



QUADRANGLE LOCATION

SCALE 1:24,000



CONTOUR INTERVAL 5 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

SCALE
1:24,000



MONTGOMERY WATSON
Chicago, Illinois

AMERICAN CHEMICAL SERVICE, INC.
GRIFFITH, INDIANA

**SITE LOCATION MAP
AND HOSPITAL ROUTE**

FIGURE
1

